

# EXHIBIT 7

**TWITTER**  
**SUMMARY OF PARTIES' DISPUTES REGARDING SEARCH TERMS**

<b>No.</b>	<b>RFP</b>	<b>LEAD PLAINTIFF'S PROPOSAL<sup>1</sup></b>	<b>DEFENDANTS' PROPOSAL</b>	<b>NOTES</b>
1.	All documents and communications concerning User Engagement.	DAU* OR ((use* OR using OR usag* OR audience) w/5 (daily OR activ* OR healthy OR heavy OR light OR add* OR new OR stat* OR metric* OR retain* OR retention OR report* OR disclos* OR inform* OR grow* OR increas* OR decreas* OR declin* OR flat* OR stagnant OR stale OR stall*)) OR churn* OR engag* OR "daily activ*" OR "come clean" OR "Timeline Views" OR "TimelineViews" OR "Timeline View" OR TLV*	<ul style="list-style-type: none"> <li>• DAU* OR "Daily Active User" OR "Daily Active Users" OR "Daily User" OR "Daily Users" OR "Daily Active Usage" OR "Daily Usage" OR "Daily Active Use" OR "Daily Use" OR "heavy user" OR "heavy use" OR "light user" OR "light use" OR "healthy user" OR "healthy use" OR "user states" OR "user activity" OR "user activities" OR "user actions"</li> <li>• engagement w/5 (measur* OR determin* OR calculat* OR track* OR report* OR disclos* OR inform* OR grow* OR increas* OR decreas* OR declin* OR flat* OR stagnant OR level* OR stale OR stall* OR tweet* OR re-tweet* OR retweet* OR search* OR DM* OR "direct messages" OR favorite* OR "likes" OR activit*)</li> <li>• ("Timeline Views" OR</li> </ul>	The parties agree to search the period 10/1/14 – 9/30/15.

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<sup>1</sup> As used herein, "\*" functions as a wildcard root extender that will pick up none, one or more than one characters that follow the root. Thus, "use\*" would pick up "use," "user," "uses," or "users." Lead Plaintiff also assumes that a wildcard search within quotation marks can be performed: i.e., "daily activ\*" will return "daily active" and "daily activity."

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			“TimelineViews” OR TLV*) w/5 (discont* OR report* OR disclos* OR “phase out” OR retire* OR sunset OR disclos* OR inform*)	
2.	All documents and communications concerning Monthly Active Users.	MAU* OR (monthly w/5 ((use* OR using OR usag*)))	(MAU OR “monthly active user” OR “monthly active usage” OR “monthly active usage” OR “monthly user” OR “monthly use”) w/5 (engag* OR retain* or retent* OR churn* OR grow* OR increas* OR decreas* OR declin* OR flat* OR stagnant OR level* OR stale OR stall*)	The parties agree to search the period 10/1/14 – 9/30/15.
3.	All documents prepared for, distributed at, or memorializing any meetings, whether internal or external to Twitter, involving the Individual Defendants or any other officer or Executive of Twitter, during which User Engagement and/or Monthly Active Users was discussed, including, but not limited to, Tea Time meetings.	Search terms proposed for RFPs 1 and 2, plus “Tea Time”	Defendants believe that searches as set forth for requests 1 and 2 will capture all responsive documents from any custodians. Defendants will search any central files maintained for regularly scheduled meetings, including Tea Time meetings, during the search period.	The parties agree to search the period 10/1/14 – 9/30/15.  Defendants propose to redact from the meeting materials content that does not relate to Plaintiff's allegations. Plaintiff does not accept Defendants' proposal to redact materials on the basis of relevance.

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4.	All documents showing the Individual Defendants' and their assistants' use of or access to any internal databases used to track User Engagement or MAUs, including, but not limited to, user activity reports, log-ins, and data viewed by the Individual Defendants.	All of Plaintiff's proposed search terms for Requests 1, 2 and 3.	All of Defendants' search terms proposed for Requests 1 and 2, plus the term "Tableau."	The parties agree to search the period 10/1/14 – 9/30/15.
5.	All documents and communications concerning Ad Engagements.	((ad or advertis*) w/3 engag*) OR (revenue w/5 engag*)	("Ad engagement" OR "advertising engagement") w/5 ("SEC" OR "Securities and Exchange Commission" OR "Comment Letter" OR "10-Q" OR "10-K" OR "disclos*" OR report * OR helpful OR "user engagement")	The parties agree to search the period 10/1/14 – 9/30/15.
10.	All documents concerning any communications, press releases, conference calls, webcasts, presentations or meetings with any Twitter shareholders, securities analysts, financial analysts, institutional investors, financial publications, or investment bankers, including but not limited to: <ol style="list-style-type: none"> <li>(a) November 12, 2014 Analyst Day;</li> <li>(b) February 5, 2015 Q4 2014 Earnings Press Release and Form 8-K;</li> <li>(c) February 5, 2015 Q4 2014 Earnings Call;</li> <li>(d) February 12, 2015 Goldman Sachs Technology &amp; Internet</li> </ol>	(analyst* OR investor* OR shareholder* OR stockholder*) w/15 (meet* OR call* OR inquir* OR question* OR email* OR letter* OR conf* OR feedback OR complain* OR suggest* OR comment* OR request* OR view*)	(("Analyst Day" OR (Goldman w/10 conference) OR ("Morgan Stanley" OR MS) w/10 conference) OR ((JPM OR "JP Morgan" OR "Global Technology, Media & Telecom") w/10 conference) OR quarter* OR earnings) w/ 5 ((call* OR present* OR deck* or slide* or material*) OR "talking points" OR ("Q&A" or (Question w/3 answer*)))	The parties agree to search the period 10/1/14 – 9/30/15.  The parties have agreed to limit the application of the search terms for this Request to the following custodians/mailboxes: Krista Bessinger (who also receives mail directed to the general investor relations mailbox); Gabriel Stricker; Anthony Noto; and Richard Costolo.  In addition to ESI searches, Defendants propose to produce any transcripts and/or other materials from the conferences listed in this RFP, to the extent those materials exist and are readily accessible

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	Conference; (e) March 2, 2015 FY2014 10-K; (f) March 3, 2015 Morgan Stanley Technology Media & Telecom Conference; (g) April 28, 2015 Q1 2015 Earnings Press Release; (h) April 28, 2015 Q1 2015 Earnings Call; (i) May 11, 2015 Q1 2015 Form 10-Q; (j) May 20, 2015 JP Morgan Global Technology, Media & Telecom Conference; and (k) July 28, 2015 Q2 2015 Earnings Call. <i>See</i> Dkt. No. 81, ¶¶29-31, 37-38, 41-43, 52-54, 60-63, 79-84, 86, 88, 88 n.32, 90, 98-101, 103, 103 n.43, 105, 108-109.			upon a reasonably diligent search of Investor Relations' document storage.
11.	All documents and communications concerning the retention, engagement, and/or consultation with any third party, including public relations consultants, disclosure consultants, and/or legal advisors in connection with Twitter's public disclosures during the Class Period.	(“press release” OR 10-Q OR 10Q OR 10-K OR 10K OR 8-K OR 8K) w/50 (draft* OR edit* OR comment* OR disclos* OR material*) PLUS names and domain names for any third party consultants.	(engag* OR retain* OR retent* OR consult* OR review* OR hire* OR hiring) w/25 (“Wilson Sonsini” or WSGR) OR (Sard or Verbinnen)	The parties have agreed to limit this search to the Class Period.

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12.	All documents and communications regarding Twitter's share price, market capitalization, number of shareholders, volume of shares traded, the value of any Twitter options or other securities, or coverage of Twitter by securities analysts or the news media.	(stock* OR securit* OR share* OR option*) w/25 (pric* OR valu* OR market OR (cap or capital) OR liquid* OR increas* OR declin* OR drop* OR trad*)	(Twitter OR TWTR OR our) w/5 (stock* OR share*) w/5 (pric* OR valu* OR increas* OR declin* OR drop*)	<p>Defendants agree to produce analyst reports and media coverage from October 1, 2014 through September 30, 2015, to the extent they are readily identifiable within Investor Relations' document storage.</p> <p>For ESI, the parties agree to search within the same period.</p>
17.	<p>All documents and communications concerning the Individual Defendants' holdings and transactions in Twitter Securities for or during calendar years 2014 and 2015, including but not limited to all documents related to:</p> <ul style="list-style-type: none"> <li>(a) Twitter Securities held;</li> <li>(b) transactions in Twitter Securities, including purchases, sales, donations or use of Twitter Securities as collateral; and</li> <li>(c) any loans of Twitter stock or options, including, but not limited to, any prepaid variable forward contract or sale lending agreement; and</li> <li>(d) any 10b5-1 Sales Plans.</li> </ul>	<p>In addition to the documents Defendants have agreed to produce, Plaintiff requests Defendants identify the personnel responsible for approving and executing stock transactions by Twitter insiders. The ESI of those personnel, and Noto and Costolo, should then be searched for:</p> <p>((stock* OR securit* OR share* OR option*) w/25 (buy* OR sell* OR trade* OR trading OR "Form 4" OR exercise* OR hold OR transact*)) OR 10b5-1 OR "trading plan"</p>	<p>Defendants agree to produce publicly available documents responsive to (a) and (b) to the extent they are readily locatable within custodians' files.</p> <p>Defendants have represented that there are no documents responsive to (c).</p> <p>Defendants agree to produce the Individual Defendants' 10b5-1 Sales Plans, if applicable during the Class Period, in response to (d).</p>	The parties agree to limit this search to the Class Period.